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Remarks

Claims 1, 5, 6, 9, and 12 are currently amended. Claims 18 and 25 are cancelled. Claims 2-4, 7, 8, 10, 11, 13, 14, 16, 17, 19-24, 26, and 27 are as previously presented. Claim 15 is as originally filed.

The Examiner noted on page 2 of the Office Action, an incorrect designation of claim 16 in Applicant's communication of January 17, 2006. The current listing of claims presented herewith correctly identify claim 16 as previously presented.

The Examiner has objected to the amendment filed on January 17, 2006 under 35 U.S.C. 132(a) on the basis that new subject matter, and in particular reference to "executable code" was added to the specification, and has requisitioned Applicant to cancel said references. Applicant has amended paragraph 17, and claims 1 and 5, and respectfully requests that the examiner withdraw the 35 U.S.C. 132(a) objections.

The Examiner has rejected claim 5 under 35 U.S.C. 112, first paragraph, as failing to comply with the written description and enablement requirements. Claim 5 has been amended, and Applicant respectfully requests that the Examiner withdraw the 35 U.S.C. 112 first paragraph rejections of claim 5.

The Examiner has rejected claims 6 and 9 under 35 U.S.C. 112, first paragraph, for terms lacking antecedent bases. Applicant has amended claims 6 and 9 and respectfully requests that the Examiner withdraw the 35 U.S.C. 112 first paragraph rejections thereof.

The Examiner has rejected claims 1-2, 5-15, 17, 19-24, and 26-27 under 35 U.S.C. 103(a) as being unpatentable over "The Benefits of CORBA-Based Network Management" by Haggerty and Seetharaman (Haggerty) in view of "HP OpenView for Windows User Guide" (OpenView) further in view of "The Common Object Request Broker: Architecture and Specification" (CORBA), due to obviousness.

With respect to independent claims 1 and 12, Applicant has amended claim 1 to more clearly and distinctly claim the subject matter for which protection is sought by incorporation of limitations found in claim 12 which were not addressed by the Examiner in the Office Action of April 7, 2006. Specifically, claim 1 now specifically recites that the "run-time parsed operation directive" which is registered in the dictionary of operations is "*specified in said at least one managed data network entity specification file*" [Emphasis added]. Claim 12, as previously presented recites

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"registering with a dictionary of operations at run-time at least one operation name *specified in the managed data network entity specification file* via an operation directive"[Emphasis added].

The Examiner has not addressed this feature of claim 12, namely that the run-time directives of the managed data network entity specification file include *entity directives* for *run-time derivation* of the managed data network types into the derivation hierarchy and *operation directives* referencing methods which may be invoked at *run-time* by a software application using the invoke function. For at least the reason that the Examiner has not addressed this feature of the managed data network entity specification file including operation directives of claim 12, Applicant respectfully submits that the Examiner has not shown a *prima facie* case of obviousness which requires at least a *prima facie* showing that every feature of claim 12 is taught or suggested by the references.

Moreover, with respect to claim 1, the Examiner has equated the managed data network entity specification file of the present application with the "Management Information Base (MIB) file" (pg. 1-7) of OpenView. In the passages referred to by the Examiner the MIB file is described as defining "device settings and other device information" which are available as variables. These variables are held in a database used by the SNMP Manager. There is no suggestion or teaching that a single file be used to house directives for run-time derivation (hence including device information variables and class definitions) and also *operation directives* to support *run-time invocation* and execution of registered operations.

The unity and direct operation of the architecture taught by the present application including run-time parsing, run-time class derivation, and run-time registration of methods for invocation, are features of the invention as a whole, and which, as described in the specification, supports the software development methodology, resulting in a system having application code which is easy to understand, debug, extend, test, and deploy, while still being efficient when used in real-time. The combination of technologies assembled by the Examiner, and particularly the picking and choosing of disparate, and in some cases proprietary and internal features of OpenView, and CORBA, following the Examiner's observation that Openview and CORBA are commonly referenced in a single paper by Haggerty is, in Applicant's view, a result of particular understanding by the Examiner in combination with hindsight, due to familiarity with the present application and its teachings. Although Haggerty does refer to both OpenView and CORBA, it does not go so far as to teach or suggest the

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combination of the particular elements of each of OpenView and CORBA to arrive at the claimed subject matter. Moreover, neither OpenView nor CORBA teach or suggest the combination of their particular features, one with the other. The internal functioning of the SNMP Manager of Openview using an MIB, and the internal dictionary of CORBA to enable CORBA's proprietary ORB functionality are not related by each other to one another nor are they sufficiently related by Haggarty to one another to allow a person skilled in the art, without the Examiner's particular understanding and hindsight, to arrive at the claimed invention.

Moreover, Applicant respectfully submits that although the motivation in general to combine the references to "provide customers with an easy means to configure and monitor GDC equipment" (Haggarty) is a valid one, Applicant submits that the motivation to combine the particular features of the references in the particular manner as recited in the claims cannot be found in the references, singly or in combination. And as submitted hereinabove, any motivation to combine the references in the particular manner discovered by the Examiner is in fact related to hindsight by the Examiner.

Applicant submits for at least the reasons given hereinabove, that amended independent claims 1 and 12 are not obvious in view of Haggarty, further in view of Openview, further in view of CORBA. Applicant therefore respectfully requests that the Examiner withdraw the 35 U.S.C. 103(a) rejections of independent claims 1 and 12.

With respect to remaining dependent claims 2-17, 19-24, 26, and 27, which depend from one of amended independent claims 1 and 12, Applicant submits that for at least the reason that claims 1 and 12 are not obvious in view of Haggarty, further in view of Openview, further in view of CORBA, so too are dependent claims 2-17, 19-24, 26, and 27 not obvious in view of Haggarty, further in view of Openview, further in view of CORBA, and Applicant respectfully requests that the Examiner withdraw the 35 U.S.C. 103(a) rejections thereof.

Favorable consideration is respectfully requested.

Respectfully submitted,



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